

DEPARTMENT OF ECOLOGY
Water Quality Program
Memorandum

December 20, 2012

TO: Brian Nickel, EPA Region 10

THROUGH: Jim Bellatty, WQ Eastern Regional Section Manager

FROM: Diana Washington, WQ ERO Permit Unit Supervisor

SUBJECT: Comments on the Draft NPDES Permits and Fact Sheets ID0022853, ID0025852, and ID0026590

Dear Mr. Nickel,

We appreciate the opportunity to review these permits prior to formal public comment. The above referenced draft permits and Fact Sheets were reviewed by Ecology permit and watershed unit staff. We have attached the documents you provided to us with embedded comments specific to each permit for your convenience and review. The permits are very similar and due to time constraints, not all of the permits were reviewed. Most of the comments imbedded in the Coeur d'Alene permits apply to all of the permits. The following general comments also apply to all of the draft permits.

General Comments:

- Final Effluent Limits and Monitoring Requirements in all three permits: Table 1 should contain the limiting flow upon which the permit limits are based. The fact sheet appears to use different flows for calculations. Please clarify by adding flow to this table.
- Will the TP, CBOD, and Ammonia meet the equivalency requirement of the TMDL? We reviewed the calculation sheets provided by the discussion in the fact sheet. The discussion is not clear and we do not agree that the limits in the permits will meet equivalency requirement for the TMDL. The permits must include seasonal average limits for all three parameters. This allows a direct comparison to verify the facilities are complying with the TMDL requirements, without relying on any assumptions of data distribution, independence, and variability.
- Appears to be some confusion on the way the metals limits are calculated. Please see the comments in the permit.
- Ammonia exceedance question was posed by Pat Hallinan. The ammonia permit limit calculations (based on meeting aquatic life criteria) for the draft Coeur d'Alene permit specifies loading limits for ammonia based on the effluent concentrations necessary to meet receiving water criteria, and using a design flow of 6.0 mgd. However, at lower effluent flows, these loading values do not protect receiving water criteria. Pat provided a spreadsheet with his calculation.

- I did not see mention of delta elimination tools being developed by the DOTMDL advisory group and Ecology. The tools being evaluated for implementation into the permits include: static equivalence, trading, extended season limits, dynamic equivalency bubble permits, ortho P, BAP... Will EPA be allowing use of these tools if developed and the model demonstrates equivalency with the DOTMDL?

Thank you for providing an early opportunity to comment on the draft permits. If you have questions please direct them to Diana Washington, 509-329-3504 or dwas461@ecy.wa.gov

Sincerely,

[Sig block]